DICK BROADCASTING CO. INC.

April 9, 2019

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, N.W.
Washington, D.C. 20554

Re: 2018 Quadrennial Regulatory Review-Review of the Commission's Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996
MB Docket No. 18-349

Dear Ms. Dortch:

I am the President and controlling shareholder of Dick Broadcasting Company, Inc. of Tennessee ("DBC"). I am taking this opportunity to reach out to the Federal Communications Commission in support of the arguments that the National Association of Broadcasters is presenting in connection with the 2018 Quadrennial Review of media ownership policies.

I am a lifelong broadcaster and DBC today owns and operates 20 stations in small to medium radio markets in the states of North Carolina, South Carolina, and Georgia. Based on my experience and taking into consideration the changes that have occurred during my years in the radio broadcast industry, I see the need for further consolidation in what has become a new unwired world of entertainment on demand.

While the benefits of further deregulation will make our business a more viable operating business, I also strongly believe that further deregulation will bring even greater benefits to the end user/listener and the communities we, as broadcasters, serve. In small markets, where I have most of my experience, owing to numerous factors including fewer potential advertisers and national and regional advertisers directing their advertising spend to larger markets, our revenues pale in comparison to top 50 markets. This is relevant for it takes top-line income to attract and pay strong local on-air talent, to provide local news and information, to offer health insurance and to deliver other benefits to our employees. Without qualified talent, strong programming, and local news, sports and informational programming, radio broadcasting cannot attract the listening public from the programming and information offered by our DBS, Internet, and smartphone-based competitors.

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The realty of small market radio today is that most of the large group broadcasters (e.g., iHeartMedia) no longer employ local on-air talent at each individual station and, instead, stream talent from a central location to multiple markets. This may be fine as a business proposition but, when, for instance, a disaster, such as Hurricane Florence occurs, there is no one broadcasting from the local radio station to provide the local news and information communications that we as broadcasters are expected, by our listeners and local officials, to make available.

I firmly believe that further deregulation of media ownership would change the radio business only for the better. In this regard, I submit that if the limitations on media ownership were reduced or eliminated, the larger broadcasting companies would no longer have a need to own smaller market stations and would concentrate their ownership on the larger markets. The result of this would be that the smaller markets would return to what they have historically been: markets owned by individual and small group broadcasters, such as DBC, who are of a local or regional background and desire to serve the smaller markets that they are familiar with, through locally developed talent and programming they knew, from their own experience and not a consultant, will interest and attract listeners to their stations.

Additionally, we must all acknowledge that the audio entertainment landscape we knew from past decades is no longer present and will not return. When the local radio ownership rules were last significantly changed, in the 1996 Telecommunications Act, there were no smartphones, no Apple Music, no Apple Radio, no playlists, Spotify was not available, and XM and Sirius had not yet launched their satellites. Likewise, Pandora was not in existence, Alexa was the name of a person, and Amazon had just begun and was primarily selling books, not delivering on-demand music. These changes have offered our listeners, and especially our younger ones who have grown up in an online world, the chance to have entertainment that that they select on their schedule and without middlemen, such as radio broadcasters, making all of their listening decisions.

Many of my colleagues will take some audience measurement numbers and then argue that the industry is doing well, while others will argue that media concentration will have adverse consequences on new market entrants, including minority broadcasters who are suffering the same economic consequences faced by the rest of us. However, we must admit to ourselves that the die is cast. The only way to enable broadcasters, including women and minority-owned broadcasters, to continue to operate is to relax ownership limits and send a message to the lending community that there will now be stability and scale in the industry and there will be justification to lend again to broadcasters, including minority broadcasters and new entrants. In essence, a better business model works for all broadcasters and will serve to attract, especially in smaller markets, where the cost of entry and operation is far less, new broadcasters who can make the changes we need in our industry in order to compete with the online world.

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I could continue on with the reasons that I believe the Commission should and needs to support the NAB' recommendations, as recently articulated by its Chief Executive Officer, Gordon Smith. in his keynote address at the NAB Show on April 8,2019, but won't. I urge the FCC to take the handcuffs off and provide radio, especially radio that serves small markets, with the chance to compete and thrive in the changing world of audio entertainment delivery.

Respectfully submitted,

J. Allen Dick
President
Dick Broadcasting Company, Inc. of Tennessee

cc: Chairman Ajit Pai
Commissioner Michael O'Rielly
Commission Brendan Carr
Commissioner Jessica Rosenworcel
Commissioner Geoffrey Starks

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